

**DOCKET NO. 2003-326-C**

Analysis of Continued Availability of )  
Unbundled Local Switching for Mass Market )  
Customers Pursuant to the Federal )  
Communication Commission's Triennial )  
Review Order (Docket No. 2003-326-C) )

1. Do you provide qualifying service to any end user customers in BellSouth's service territory in South Carolina?

**Prepared by:** Stan Bugner, State Director - Regulatory and Government Affairs

- Response:** N/A

**Prepared by:** Stan Bugner, State Director - Regulatory and Government Affairs

3. If the answer to Interrogatory No. 1 is in the affirmative, state whether Company owns the switch used to provide qualifying service to end user customers in BellSouth's service territory in South Carolina, irrespective of whether the switch itself is located in the state and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). If so, please:
- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
  - (b) provide the street address, including the city and state in which the switch is located;
  - (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
  - (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
  - (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
  - (f) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG") or explain why the switch is not identified in the LERG.

**Response:** N/A

**Prepared by:** Stan Bugner, State Director - Regulatory and Government Affairs

4. For each BellSouth wire center area identified in Interrogatory No.2 (or BellSouth exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to the foregoing Interrogatory.

**Response:** N/A

**Prepared by:** Stan Bugner, State Director - Regulatory and Government Affairs

5. With regard to the voice-grade equivalent lines identified by BellSouth wire center area (or BellSouth exchange) in response to Interrogatory 4, separate the lines by end user and end user location in the following manner:
  - (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
  - (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
  - (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
  - (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;

- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines.

**Response:** N/A

**Prepared by:** Stan Bugner, State Director - Regulatory and Government Affairs

6. If the answer to Interrogatory No. 1 is in the affirmative, state whether Company uses a switch owned by a person other than Company (except

ILEC switches used either on an unbundled or resale basis) in providing qualifying service to end user customers in BellSouth's service territory in South Carolina, irrespective of whether the switch itself is located in the state and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). If so, please:

- (a) provide the CLLI code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) provide information relating to the switch as contained in Telcordia's LERG or explain why the switch is not identified in the LERG.

**Response:** N/A

**Prepared by:** Stan Bugner, State Director - Regulatory and Government Affairs

7. For each BellSouth wire center area identified in Interrogatory No.2 (or BellSouth exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to the foregoing Interrogatory.

**Response:** N/A

**Prepared by:** Stan Bugner, State Director - Regulatory and Government Affairs

8. With regard to the voice-grade equivalent lines identified by BellSouth wire center area (or BellSouth exchange) in response to Interrogatory 7, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

**Response:** N/A

**Prepared by:** Stan Bugner, State Director - Regulatory and Government Affairs

9. Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region? If the answer to this

Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:

- (a) Provide the CLLI code of the switch;
- (b) Provide the street address, including the city and state in which the switch is located;
- (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) Identify all documents referring or relating to the rates, terms, and conditions of Company's provision of switching capability.

**Response:** Verizon objects to this request as overbroad, unduly burdensome and seeks information that is neither relevant to this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence insofar as it seeks information relating to Verizon South's operations outside the State of South Carolina. Notwithstanding its general and specific objections, Verizon South



does not provide switching capacity to any local exchange carrier for use in providing qualifying service in BellSouth territory.

**Prepared by:** Stan Bugner, State Director - Regulatory and Government Affairs